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11 DAYLE ELIESON
12 United States Attorney
13 *Of Counsel*

14 *Attorneys for the United States of America*

15 UNITED STATES DISTRICT COURT
16 DISTRICT OF NEVADA

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 RAYMOND W. CRIHFIELD; LISA A.
21 CRIHFIELD; AMBER L. CRIHFIELD; and
22 DISCOVER BANK

23 Defendants.
24

)
) Case No. 2:17-cv-02854-APG-GWF

)
) UNITED STATES' MOTION TO
) EXTEND THE DISCOVERY CUT-OFF
) DATE BY NINETY (90) DAYS

25 The Plaintiff, United States of America ("United States"), by and through its undersigned
26 counsel, hereby moves to extend the discovery cut-off date in this case until ninety (90) days
27 after the Court enters an order on the Government's motion for summary judgment that was filed
28 on October 22, 2018. *See* ECF #17. The discovery cut-off date is currently December 17, 2018.
29 *See* ECF #13, at 2.

1 The Government's motion for summary judgment would resolve this case if it is granted.
2 But if the Court denies the referenced motion for summary judgment, the Government would
3 like the opportunity to complete discovery on any issues that are not resolved by the Court's
4 Order on the motion. The requested 90 day extension would assist in reducing litigation costs
5 and it would also enable the undersigned Government attorney – who is located in Washington
6 D.C. – to better plan, and travel to, the depositions of the individual defendants (who live in two
7 different states) if the motion for summary judgment is denied.

8 The undersigned counsel spoke to Defendant Raymond W. Crihfield by telephone on
9 November 6, 2018 and Mr. Crihfield represented that he and his wife (Defendant Lisa A.
10 Crihfield) do *not* oppose this motion. The undersigned also contacted Defendant Amber
11 Crihfield, who said she would consider the extension. However, Amber Crihfield has not yet
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1 stated whether or not she is in agreement with it. It appears that there would be no prejudice to
2 any party if the Court grants this motion for an extension of the discovery deadline.

3 Dated: November 7th, 2018

4 RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

6 /s/ Charles M. Duffy
CHARLES M. DUFFY
Trial Attorney, Tax Division
U.S. Department of Justice

8 DAYLE ELIESON
United States Attorney
Of Counsel

10 Attorneys for the United States of America

13 IT IS SO ORDERED:

14 
16 UNITED STATES MAGISTRATE JUDGE

18 DATED: 11-13-2018